

reconstructed list contained individuals whose passes were inactive as of June 10, 1993.

2. Methodology Used to Determine the Type of Pass Held by Individuals on Reconstructed WHOP List

The OIC also used a reconstruction methodology to determine the type of pass (e.g., White House, New Executive Office Building, Volunteer, etc.) a person on the reconstructed June 10, 1993 list held on that date. Determining each person's pass type allowed the OIC to identify and further analyze patterns of Mr. Marceca's requests for background reports.

First, the OIC compared the WAVES (WAV058BS) May 2, 1993 WAVES active passholder list with the WAVES (WAV058BS) August 1, 1993 WAVES active passholder list. If the same individual had the same pass type on both lists, then the same pass type was entered for the reconstructed June 10, 1993 list on the ground that the person was a continuous passholder between those days and that it was unlikely that the type of pass changed and then changed back to the same pass type between those dates.

For those whose pass types could not be established in this way, the OIC next reviewed their pass history on the E-PASS printout. The OIC used the pass type on June 10, 1993 or, if the person was listed as "inactive" or "archived" prior to that date, the OIC used the last pass type held by the person.

For those whose pass types still could not be determined under the prior two methodologies, the OIC referred to a WAVES